

# **EXHIBIT G**

1/14/2025

Richard Kadrey, et al. v. Meta Platforms, Inc.

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Sy Choudhury 30(b)(6)

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, et al., )  
                              )  
Individual and            )  
Representative            )  
Plaintiffs,             )  
                              )  
v.                         ) Case No. 3:23-cv-03417-VC  
                              )  
META PLATFORMS, INC.,    )  
                              )  
Defendant.              )  
                              )

\*\* HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*

Videotaped Deposition of Meta  
by and through its corporate designee  
SY CHOUDHURY  
San Francisco, California  
Tuesday, January 14, 2025

Reported Stenographically by  
Michael P. Hensley, RDR, CSR No. 14114

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1                   THE VIDEOGRAPHER: We're at 58 minutes.

2                   ATTORNEY PRITT: Should we use this one?

3                   Hmm. All right. I don't have any further  
4 questions.

5                   ATTORNEY HARTNETT: I have a brief  
6 redirect.

7                   EXAMINATION

8 BY ATTORNEY HARTNETT:

9                   Q. Mr. Choudhury, as a corporate  
10 representative of Meta, you testified about a  
11 meeting prior to your meeting that you personally  
12 attended sometime during the week of April --  
13 April -- or first week of April 2023; correct?

14                  A. That's correct.

15                  Q. And you spoke with opposing counsel about  
16 considerations that were discussed in the meeting  
17 prior to your meeting; correct?

18                  A. Correct.

19                  Q. Were there, in addition to the  
20 nonprivileged reasons that you discussed today,  
21 legal considerations discussed in that meeting of a  
22 privileged nature?

23                  A. There was.

24                  ATTORNEY HARTNETT: That's all.

25                  ATTORNEY PRITT: Well, then I have a

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1 re-redirect. I have two minutes.

2 EXAMINATION

3 BY ATTORNEY PRITT:

4 Q. Mr. Choudhury, you didn't mention any  
5 legal considerations when I asked you what the  
6 considerations were; correct?

7 A. Correct.

8 Q. And now you're saying there are and there  
9 were legal considerations; correct?

10 A. They -- we did ask for legal guidance  
11 in -- in both the meetings.

12 Q. Who did you ask legal guidance from?

13 A. Mo Metanat.

14 Q. And what was the subject, without getting  
15 into what the actual legal guidance was, about?

16 A. Should we -- whether we should pause or  
17 continue the discussions, the licensing discussions.

18 Q. Yeah. I asked was the legal advice or  
19 legal -- sorry. What was the subject of the legal  
20 advice that you asked for, not whether you should  
21 pause or continue licensing?

22 A. That's all --

23 ATTORNEY HARTNETT: Object to the form.

24 And asked and answered.

25 THE WITNESS: That's -- that's all we

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1 discussed.

2 BY ATTORNEY PRITT:

3 Q. So it's your testimony that whether or not  
4 to pause or continue licensing involves legal  
5 advice?

6 A. Yes.

7 ATTORNEY PRITT: Okay. I have no further  
8 questions.

9 THE VIDEOGRAPHER: Okay. Is that it?

10 ATTORNEY HARTNETT: Yes. Thank you.

11 THE VIDEOGRAPHER: Okay. This is the end  
12 of Video 1 of 1 and concludes Volume Number 2 in the  
13 30(b)(6) deposition of Meta Platforms, Inc., by Sy  
14 Choudhury.

15 We are now off the record. The time is  
16 11:56.

17 (Deposition concluded at 11:56 A.M.)

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